

Ameren Services

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September 26, 2001

Operating Permit Unit  
Air Pollution Control Program  
Missouri Department of Natural Resources  
PO Box 176  
Jefferson City MO 65102



Re: Semi-Annual Compliance Certification – Rush Island Plant – Operating Permit  
Number OP2000061

Dear Sir or Madam:

In accordance with the requirements of Rush Island Plant Operating Permit Number OP2000061, AmerenUE submits this semi-annual report certifying compliance with the monitoring, record keeping and reporting requirements of the permit for the period January 1, 2001 through June 30, 2001. This certification includes the following information required by the operating permit:

- Identification of each term or condition of the permit that is the basis of the certification,
- Current compliance status,
- Whether compliance was continuous or intermittent,
- Method(s) used for determining compliance status and whether method was continuous or intermittent,
- Additional information required to determine compliance with permit conditions, i.e. references to Notice of Violations, Exceedance Reports, quarterly Opacity Excess Emission Reports, quarterly SO2 Excess Emission Reports.

Inclusion of the above information in this certification fulfills the reporting requirement described in Operating Permit Number OP2000061.

**Plant Wide Emission Limitations**

**Permit Condition:** PW001 – Restriction of Particulate Matter to the Ambient Air beyond the Premises of Origin

**Compliance Status:** In Compliance - Periodic Monitoring was conducted in accordance with permit requirements

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Recordkeeping

**Method (Continuous) or (Intermittent):** Intermittent

**Permit Condition:** PW002 – SO3 Injection System Construction Permit  
**Compliance Status:** In Compliance – SO3 Injection System operated in a manner to promote maximum particulate efficiency of the electrostatic precipitators in accordance with procedures in construction permit 0992-017 dated September 17, 1992.

**Compliance (Continuous) or (Intermittent):** Continuous

**Method used to show compliance:** Recordkeeping

**Method (Continuous) or (Intermittent):** Continuous

**Permit Condition:** PW003 – Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

**Compliance Status:** Reference the individual indirect heating sources subject to this rule

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Reference the individual indirect heating sources subject to this rule

**Method (Continuous) or (Intermittent):** Intermittent

**Permit Condition:** PW004 – Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

**Compliance Status:** In Compliance

**Compliance (Continuous) or (Intermittent):** Continuous

**Method used to show compliance:** Recordkeeping

**Method (Continuous) or (Intermittent):** Continuous

**Permit Condition:** PW005 – Emission Standards for Hazardous Air Pollutants

**Compliance Status:** In Compliance

**Compliance (Continuous) or (Intermittent):** Continuous

**Method used to show compliance:** Recordkeeping

**Method (Continuous) or (Intermittent):** Continuous

#### **Emission Unit Specific Emission Limitations**

**Permit Condition:** EU0010 and EU0020-01 Boiler 1&2 - Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

**Compliance Status:** In Compliance – Recordkeeping was conducted in accordance with permit requirements. Weekly precipitator readings were overlooked on four individual occasions. Procedures were improved to avoid this in the future.

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Recordkeeping

**Method (Continuous) or (Intermittent):** Intermittent

**Permit Condition:** EU0010 and EU0020-02 Boiler 1&2 - Restriction of Emission of Visible Air Contaminants  
**Compliance Status:** Details provided in the Continuous Emission Monitor Quarterly Report - Opacity  
**Compliance (Continuous) or (Intermittent):** Intermittent  
**Method used to show compliance:** Continuous Opacity Monitor  
**Method (Continuous) or (Intermittent):** Continuous

**Permit Condition:** EU0010 and EU0020-03 Boiler 1&2 - Restriction of Emission of Sulfur Compounds  
**Compliance Status:** In Compliance – Details provided in the Continuous Emission Monitor Quarterly Report – SO<sub>2</sub>  
**Compliance (Continuous) or (Intermittent):** Continuous  
**Method used to show compliance:** Continuous Emission Monitors  
**Method (Continuous) or (Intermittent):** Continuous

**Permit Condition:** EU0030-01 Auxiliary Boiler - Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating  
**Compliance Status:** In Compliance  
**Compliance (Continuous) or (Intermittent):** Continuous  
**Method used to show compliance:** Recordkeeping  
**Method (Continuous) or (Intermittent):** Continuous

**Permit Condition:** EU0030-02 Auxiliary Boiler - Restriction of Emission of Visible Air Contaminants  
**Compliance Status:** In Compliance – Annual USEPA Test Method 9 conducted in February 2001.  
**Compliance (Continuous) or (Intermittent):** Intermittent  
**Method used to show compliance:** Periodic Monitoring  
**Method (Continuous) or (Intermittent):** Intermittent

**Permit Condition:** EU0030-03 Auxiliary Boiler - Restriction of Emission of Sulfur Compounds  
**Compliance Status:** In Compliance  
**Compliance (Continuous) or (Intermittent):** Continuous  
**Method used to show compliance:** Recordkeeping  
**Method (Continuous) or (Intermittent):** Continuous

**Permit Condition:** EU0060-01 Emergency Diesel Generator - Restriction of Emission of Sulfur Compounds  
**Compliance Status:** In Compliance  
**Compliance (Continuous) or (Intermittent):** Continuous  
**Method used to show compliance:** Recordkeeping  
**Method (Continuous) or (Intermittent):** Continuous

**Permit Condition:** EU0070-01 Silos for Coal Storage - Restriction of Emission of Visible Air Contaminants

**Compliance Status:** In Compliance

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Recordkeeping

**Method (Continuous) or (Intermittent):** Intermittent

**Permit Condition:** EU0080-01 Cold Solvent Cleaner – Control of Emissions from Solvent Metal Cleaning

**Compliance Status:** In Compliance

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Recordkeeping

**Method (Continuous) or (Intermittent):** Intermittent


I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the above statements and information are true, accurate, and complete.

If you have any questions, please contact Steve Hughes at (314) 554-3651.

Sincerely,

*Andrew P. Neuhalfen* 9/26/01

A. P. Neuhalfen  
Manager, Rush Island Plant

cc:  USEPA Region 7  
Missouri Air Compliance Coordinator  
901 North Fifth Street  
Kansas City, KS 66101

Missouri Department of Natural Resources  
Air Pollution Control Program  
Enforcement Section Chief  
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